

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In Re:	:	Chapter 11
	:	Case No. 01-1139 (JKF)
	:	
W.R. GRACE & CO., <i>et al.</i> ,	:	(Jointly Administered)
	:	
	:	Hearing Date: March 28, 2011 at 9:00 a.m.
Debtors.	:	Objection Deadline.: March 11, 2011 at 4:00 p.m.
	:	
	:	Related Docket Nos. 26154 and 26155

**NOTICE OF MOTION OF BNSF RAILWAY COMPANY FOR RECONSIDERATION  
OF THE MEMORANDUM OPINION REGARDING OBJECTIONS TO  
CONFIRMATION OF FIRST AMENDED JOINT PLAN OF REORGANIZATION AND  
RECOMMENDED SUPPLEMENTAL FINDINGS OF FACT AND CONCLUSIONS OF  
LAW [DOCKET NO. 26154] AND THE RECOMMENDED FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND ORDER REGARDING CONFIRMATION OF FIRST  
AMENDED JOINT PLAN OF REORGANIZATION AS MODIFIED THROUGH  
DECEMBER 23, 2010 [DOCKET NO. 26155]**

PLEASE TAKE NOTICE that on February 10, 2011, BNSF Railway Company ("BNSF") filed the Motion Of BNSF Railway Company For Reconsideration Of The Memorandum Opinion Regarding Objections To Confirmation Of First Amended Joint Plan Of Reorganization And Recommended Supplemental Findings Of Fact And Conclusions Of Law [Docket No. 26154] And The Recommended Findings Of Fact, Conclusions Of Law And Order Regarding Confirmation Of First Amended Joint Plan Of Reorganization As Modified Through December 23, 2010 [Docket No. 26155] (The "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **March 28, 2011 at 9:00 a.m.** (ET) before the Honorable Judith K. Fitzgerald, United States Bankruptcy Court for the District of Delaware, 5<sup>th</sup> Floor, Courtroom No. 6, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be made in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Wilmington, Delaware 19801, **on or before March 11, 2011 at 4:00 p.m. (ET)** and (ii) served so as to be actually received by the undersigned counsel on or before the Objection Deadline.

**IF YOU FAIL TO RESPOND TO THE MOTION IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR OPPORTUNITY FOR A HEARING.**

Dated: February 10, 2011  
Wilmington, Delaware

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